U.S. Department of Justice

United States Attorney
Eastern District of New York

271 Cadman Plaza East
Brooklyn, New York 11201

F.# 2009R01111

December 10, 2010

By Express Mail

James M. Branden, Esq.
Law Offices of James M. Branden
551 Fifth Avenue
New York, NY 10176

Re: United States v. Victor Dacosta Bourne
Criminal Docket No. 08-888 (S-2) (NGG)

Dear Mr. Branden:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government furnishes the following supplemental discovery with respect to the above-referenced case. The government also renews its request for reciprocal discovery.

Bank records from JPMorgan Chase Bank for account number 301131330465. (Bates 000001640 - 000002055).

Business Records from Jones Apparel Group. (Bates 000002057 - 000002170).

Business Records from Levi Strauss Inc. (Bates 000002177 - 000002266).

Business Records from Nike USA, Inc. (Bates 000002267 - 000002371).

Business Records from Wolverine World Wide, Inc. (Bates 000002372 - 000002414).

Business Records from Adidas (Bates 000002416 - 000002491).

Business Records from Deckers Outdoors Corporation (Bates 000002493 - 000002564).

Business Records from PUMA (Bates 000002565, 000002568 - 000002741).

Business Records from New Era Cap Company (Bates 000002742 - 000002960).

Business Records from Reebok. (Bates 000002961 - 000003268).

Business Records from Timberland. (Bates 000003269 000003572 - 000003597).

Business Records from Clarks. (Bates 000003598 - 3750).

Business Records for FILA USA. (Bates 000003751 - 000003794).

Business Records for Bally North America. (Bates 000003795 - 000003806).

Business Records for JLC Footwear, Inc. (Bates 000003807 - 000003818).

Business Records for Empire Merchants. (Bates 0000003820 - 000003822).

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Alexander A. Solomon
Assistant U.S. Attorney
(718)254-6074

cc: Clerk of the Court (NGG) (without enclosures)